## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

SARAH EDMONDSON, et al.,

Plaintiffs,

No.: 1:20-cv-00485-ERK-SMG

v.

:

KEITH RANIERE, et. al.

Defendants. :

**DECLARATION OF ZAHRA R. DEAN** 

## I, Zahra R. Dean declare as follows:

- 1. I am an attorney at the law firm of Kohn, Swift & Graf, P.C., counsel for Plaintiffs in the above-captioned action. I submit this declaration as proof of service of the summons and complaint in this action on Defendant Lauren Salzman, pursuant to Fed. R. Civ. P. 4(e)(1) and N.Y.C.P.L.R. 308(4).
- 2. We retained the services of APS International ("APS") to serve the defendants in this action, including Defendant Lauren Salzman. As set forth in the Affidavit of Service (attached hereto as Exhibit A), the process server attempted to personally serve the Defendant at her home on three occasions. After failing to get anyone at that residence to open the door, the server verified the address, left a copy of the summons and complaint at the Defendant's home and mailed the

summons and complaint to her at that same address. Thus, Plaintiffs, through

APS, have complied with all requirements of CPLR section 308(4), which is

deemed to be complete service of process under New York State law.

3. We have redacted Defendant Lauren Salzman's home address from

the copy of the Affidavit of Service attached hereto as Exhibit A. We have

retained the unredacted original affidavit of service in our files, and we will

produce it if requested by the Court or Defendant Lauren Salzman, or if necessary,

to respond to a challenge as to the adequacy of service on Defendant Lauren

Salzman.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 12, 2020

/s/ Zahra R. Dean

Zahra R. Dean

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have caused a copy of the foregoing Declaration of Zahra R. Dean to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered parties.

/s/ Zahra R. Dean
Zahra R. Dean